



THE COMMONWEALTH OF MASSACHUSETTS  
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MARY F. M. TIGUE  
DIRECTOR

June 3, 1992  
AO-92-10

Senator Edward L. Burke  
State House  
Room 413C  
Boston, MA 02133

Re: Travel Expenditures

Dear Senator Burke:

This letter is in response to your letters dated May 27, 1992 and March 25, 1992 requesting an advisory opinion relative to the above referenced matter.

You have asked if your political committee may expend \$2,700 to pay for a trip you are considering to the Ukraine.

You have stated that the purpose of the trip is to help you expand your interest and knowledge of health care issues and problems. In previous campaigns you have emphasized your ability to have an impact on health care policy and have made special efforts to reach out to health care provider groups for political support. Most of the individuals making up the delegation to the Ukraine are physicians and other health care professionals.

You have also noted that, although you are not running for re-election to the State Senate in 1992, you intend to keep your campaign committee intact and may, in the future, run for statewide or federal office. It is your opinion that the trip to the Ukraine and your expanded knowledge of health care issues in that part of the world would enhance your political stature with both present and future constituents and potential supporters. You also anticipate seeking political support from those with whom you travel this summer.

Section 6 of M.G.L. c.55 states, in pertinent part, that a political committee such as yours "may receive, pay and expend money or other things of value for the enhancement of the political future of the candidate . . . for which the committee was organized so long as such expenditure is not primarily for

the candidate's or any other person's personal use . . . "

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The regulations promulgated pursuant to section 6 further state that expenditures may be made for "reasonable travel and related expenses for a candidate . . . in connection with meetings, conferences or conventions, provided that the issues with which any such meeting, conference or convention is concerned are within the scope of that person's direct and substantial responsibilities as a candidate or agent of the committee, and whose subject matter is related to . . . substantive issues which are directly related to the campaign of the candidate." See 970 C.M.R. 2.05(2)(1) made applicable to your political committee by 2.06 (1).

It is the opinion of this Office that your proposed trip to the Ukraine may be paid for by your political committee. As described above, the purpose of the trip is consistent with key issues that you have addressed in previous campaigns as well as your chairmanship of the Committee on Health Care. In addition, the trip clearly has the potential to enhance your political future in a number of ways. For example, you believe that it will increase your stature with constituents and future supporters including, in particular, those with whom you will be traveling. While this Office does not routinely view expenses associated with international travel as reasonable expenses for candidates who may be considering statewide or other higher office, the special circumstances of your proposed trip to the Ukraine, including your long-standing involvement with these substantive issues, warrant the treatment of such an expenditure as within the scope of the statute and regulations. See AO-89-22.

We would note that, as with all expenditures, accurate records of expenditures made by the candidate and/or the Committee in connection with international travel must be maintained.

This opinion is based solely on the representations made in your letters as well as your telephone conversation with the Office's General Counsel, Peter Sturges, and solely in the context in M.G.L. c.55.

Please do not hesitate to contact this Office should you have additional questions.

Very truly yours,

*Mary F. McTigue*

Mary F. McTigue  
Director

MFm/wp